**Appendix A: Harmful Sexual Behaviour Self-Audit tool for Education Settings**

This self-audit tool is designed to support settings assess the effectiveness of their safeguarding arrangements for child-on-child abuse / harmful sexual behaviour – it is for the individual setting to decide how much information to record, to meet their own needs. Further information on each area of the tool can be found within the main ECC guidance *‘Child on Child Abuse - Harmful Sexual Behaviour - guidance for Essex schools and education settings’.*

The self-audit tool is divided into the following sections:

[A whole school/setting approach](#_A_whole_school/setting)

[Legal responsibilities](#_Legal_responsibilities_–)

[Policies](#_Policies_–_key)

[RE/RSE curriculum](#_RE/RSE_curriculum_–)

[Pupil voice](#_Pupil_voice_–)

[Reporting and recording procedures](#_Reporting_and_recording)

[Communicating safeguarding arrangements](#_Communicating_safeguarding_arrangem)

[Data collection and analysis](#_Data_analysis_–)

[Governance](#_Governance_–_key)

[Designated/Deputy Safeguarding Lead (DSL/DDSL) knowledge and training](#_Designated/Deputy_Safeguarding_Lead)

[Wider staff knowledge and training](#_Wider_staff_knowledge)

[Responding to HSB incidents](#_Responding_to_HSB)

[Sanctions, suspension and exclusion](#_Sanctions,_suspension_and)

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| A whole school/setting approach – key questions | **Comments / supporting evidence** | **Actions identified** |
| Are there clear messages that HSB is not acceptable and will never be tolerated? How is this communicated to pupils, parents, and staff? |  |  |
| Do school leaders create a culture of vigilance in eradicating child on child abuse? |  |  |
| Do staff and pupils feel confident to, and know how to, challenge HSB? How do you know? |  |  |
| Do pupils feel safe to report concerns? How do you know? |  |  |
| How does the setting demonstrate that concerns taken seriously?  |  |  |
| How does the setting adopt the approach ‘it could happen here’ and realise that harmful sexual behaviour is likely to exist within the setting, even if there have been no reports? |  |  |
| Is the setting alert to issues such as sexism, misogyny, homophobia, and gender stereotypes? Is there a clear culture that these issues are not tolerated? |  |  |

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| Legal responsibilities – key questions | **Comments / supporting evidence** | **Actions identified** |
| Is the relevant statutory guidance followed within the setting and known and referred to by the DSL?* Keeping Children Safe in Education (DfE, 2024)
* Relationships Education, Relationships and Sex Education (RSE) and Health Education (DfE, 2021)
* Working Together to Safeguard Children (DfE, 2023)
* Human Rights Act 1998
* Equality Act 2010
* Public Sector Equality Duty
* SET Procedures (ESCB, 2022)
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| Policies – key questions | **Comments / supporting evidence** | **Actions identified** |
| Does your setting have a policy which sets out its approach to child-on-child abuse? *(This may be within a Child Protection / Safeguarding Policy, or a separate Child on Child Abuse / HSB Policy)* |  |  |
| Are all the elements detailed within paragraphs 159 and 160 of Keeping Children Safe in Education (DfE, 2024) included within the policy regarding harmful sexual behaviour? |  |  |
| Are staff aware of the policy and do they follow it? How do you check this? |  |  |
| Are your key safeguarding policies published on the school website? *(Do they refer to current statutory guidance and are they up-to-date and within their review period?)* |  |  |
| What process is place for ensuring safeguarding policies are regularly reviewed (annually)? How do you ensure there is sufficient scrutiny of the content to ensure it is current and meets need?  |  |  |

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| RE/RSE curriculum – key questions | **Comments / supporting evidence** | **Actions identified** |
| Has the school agreed and published its curriculum policy for the delivery of RSHE (Relationships, Sex and Health Education)? |  |  |
| How do you know the teaching of the RSHE curriculum is effective? How do you test understanding? |  |  |
| Do staff receive training to enable them to deliver RSHE lessons confidently? |  |  |
| Is the implementation of the RSHE curriculum appropriately sequenced, resourced, and effective in all year groups? |  |  |
| How do you teach pupils to keep themselves (and others) safe, including online? |  |  |

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| Pupil voice – key questions | **Comments / supporting evidence** | **Actions identified** |
| How do you engage with pupils to capture pupil voice, ensuring you reach all groups of pupils, including more vulnerable groups? |  |  |
| How do pupil views contribute to and shape policies, RSHE teaching and develop practice? |  |  |
| How do you evidence that pupil voice is heard and responded to and demonstrate how it has influenced aspects of school / setting life? |  |  |
| Are there adequate arrangements in place to enable feedback to CYP so they feel listened to and so they are aware that their concerns are acted upon?  |  |  |

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| Reporting and recording procedures – key questions | **Comments / supporting evidence** | **Actions identified** |
| What systems are in place to allow pupils to report HSB? |  |  |
| Do the systems allow pupils to report concerns in a number of ways, such as online, face to face, or making reports for a friend? |  |  |
| How do you ensure the systems are well promoted, easily accessible and easily understood? |  |  |
| Are reports responded to in a timely manner? |  |  |
| Do pupils feel able to identify a trusted adult to listen to their concerns? |  |  |
| How do you check that pupils feel safe to report concerns and know how to report concerns? |  |  |
| Are reporting procedures monitored and reviewed to ensure that they are fit for purpose and being used effectively? How does pupil voice feed into this process?  |  |  |
| Are staff aware that a change in a CYP’s behaviour could be the only way a pupil communicates an incident, and do they know how to act in this instance? |  |  |

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| Communicating safeguarding arrangements – key questions | **Comments / supporting evidence** | **Actions identified** |
| What communication systems are in place to inform parents, pupils, and the wider school community about safeguarding arrangements? Are these effective? How do you monitor their effectiveness?  |  |  |
| How do you engage parents in supporting safeguarding arrangements and reinforcing key messages with their CYP at home? |  |  |
| How do you support parents with keeping their CYP safe? |  |  |
| How do you reinforce with the setting community how you prioritise safeguarding in your setting, including the management harmful sexual behaviour? |  |  |
| Are all pupils and parents / carers clear on the reporting process and support available if they have any safeguarding concerns including regarding child-on-child abuse? |  |  |
| How do you ensure pupils, parents / carers and the wider community are aware of how to escalate concerns if they feel issues are not being recognised or addressed? |  |  |
| Do staff know how to escalate concerns and are they aware of whistle-blowing procedures? |  |  |

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| Data collection and analysis – key questions | **Comments / supporting evidence** | **Actions identified** |
| Does the settings gather data on harmful sexual behaviour concerns and incidents? |  |  |
| How do the systems for recording incidents support data collection?  |  |  |
| Does scrutiny of this data take place at leadership level to ensure there is strategic oversight of harmful sexual behaviour? |  |  |
| Is your data regularly analysed and reviewed to determine emerging patterns, trends, or vulnerable groups? |  |  |
| How is the data used to positively influence practice? |  |  |
| Are there systems in place for regularly reviewing data and its use / outcomes? |  |  |

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| Governance – key questions | **Comments / supporting evidence** | **Actions identified** |
| How do governors ensure there is strategic oversight of safeguarding and that the response to harmful sexual behaviour and child on child abuse arrangements are effective?  |  |  |
| Is safeguarding a regular item on governing body meeting agendas? |  |  |
| Do Governors ensure the relevant HSB policy complies with the standards outlined on pages 43 and 44 of Keeping Children Safe in Education (DfE, 2024)? |  |  |
| Do governors ensure that the online safety policy / processes, and the filtering and monitoring arrangements comply with statutory standards? |  |  |
| Does the Governing body / proprietors have regard to Part two and Part five of Keeping Children Safe in Education (DfE, 2024)? |  |  |
| Do Governors have relevant and regular training to enable them to support and challenge the Headteacher and / or Designated Lead on safeguarding matters, including HSB? |  |  |
| Do Governors receive regular reports about harmful sexual behaviour, including the number of incidents that have been reported and the action the setting takes? |  |  |
| Designated/Deputy Safeguarding Lead (DSL/DDSL) knowledge and training – key questions | **Comments / supporting evidence** | **Actions identified** |
| Has the DSL/DDSL accessed training to understand HSB and be confident in both distinguishing and categorising sexualised behaviour? |  |  |
| Does the DSL/DDSL understand child on child abuse, including an awareness of the groups of CYP that are more vulnerable to abuse than their peers, such as girls, LGBTQ pupils or CYP with SEND? |  |  |
| Is the DSL/DDSL familiar with the definitions of sexual violence offences and sexual harassment, and the subsequent actions that should be taken following a report of a particular offence? |  |  |
| Is the DSL prepared to confidently respond to incidents before they occur? |  |  |
| Does the DSL take a lead role in each incident of harmful sexual behaviour? |  |  |
| Has the DSL/DDSL read the relevant guidance and policies in relation to responding to HSB? |  |  |
| Is the DSL aware of how to respond to incidents of sharing nudes and semi-nudes and of the guidance on this issue? |  |  |

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| Wider staff knowledge and training | **Comments / supporting evidence** | **Actions identified** |
| Do all staff receive regular and relevant training on how to recognise harmful sexual behaviour and how to report it? Has the quality and content of the staff training programme been reviewed to ensure it adequately covers this topic? |  |  |
| Have staff had training on handling reports/disclosures sensitively? |  |  |
| Have staff had training on handling reports/disclosures of sharing nudes and semi nudes? |  |  |
| How do you evidence staff training and their understanding of your policies and procedures? |  |  |
| How do you check the effectiveness of training and staff understanding? |  |  |

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| Responding to HSB incidents – key questions | **Comments / supporting evidence** | **Actions identified** |
| How are the needs of the victim kept central to decision making, and how are their wishes respected (as far as possible within the limits of the statutory framework), during a response to an incident? |  |  |
| Do pupils receive timely and appropriate support to meet their needs, and is this reviewed to ensure it is an effective intervention? |  |  |
| Are risk assessments and safety plans used where advised? Do the CYP, parents/carers and other agencies feed into the risk assessment and safety plan? |  |  |
| Are the victim and alleged perpetrator kept informed of school/setting actions at each stage of the process? |  |  |
| Is there a process for reviewing an incident to identify whether work with other pupils or the wider community is required? Does learning feed into practice going forward? |  |  |
| Is the DSL/DDSL aware of when to report to statutory agencies (police and / or Social Care)? Do they know where to access guidance on when to report? |  |  |
| Are all incidents recorded appropriately on the CYP’s CP file, ensuring all evidence is carefully recorded in case it is required by the police (including the questions asked of CYP and their responses)? |  |  |
| Do settings make referrals to relevant agencies, such as health agencies or early help agencies, to ensure ongoing support for CYP? |  |  |
| Do settings follow up with pupils after incidents to ensure the issues are not continuing? |  |  |

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| Sanctions, suspension and exclusion – key questions | **Comments / supporting evidence** | **Actions identified** |
| Does the setting’s Behaviour Policy inform the disciplinary action following HSB incidents? |  |  |
| Does the setting work within [Suspension and permanent exclusion from maintained schools, academies and pupil referral units in England, including pupil movement](https://www.gov.uk/government/publications/school-exclusion) (DfE, 2023)?  |  |  |
| Does the school know when to link in with the ECC [Education Access Team](https://schools.essex.gov.uk/pupils/Education_Access/Pages/default.aspx) regarding exclusions and suspensions? |  |  |
| Does the setting ensure they avoid unlawful ‘informal’ or ‘unofficial’ exclusions and suspensions by not asking CYP to stay at home for any period unless they are formally excluded?  |  |  |